

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**LAURA (“JANIE”) LAMM**  
**Plaintiff,**

**v.**

**HUNT COUNTY, TEXAS**  
**Defendant.**

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**CIVIL ACTION NO.**  
**3-09CV0051-P**

**JOINT PROPOSAL FOR CONTENTS OF SCHEDULING AND DISCOVERY ORDER**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COME **Plaintiff Laura Lamm** and **Defendant Hunt County, Texas** and, in accordance with the Court’s Order Requiring Attorney Conference and Proposal for Contents of Scheduling and Discovery Order, submit their Joint Proposal for Contents of Scheduling and Discovery Order, and would respectfully show unto the Court as follows:

**I.**

On March 23, 2009, the parties met in person to discuss the case, the prospects for settlement, scheduling, and discovery. The parties discussed the nature of the case and the causes of action at issue. Plaintiff made a demand for settlement which has been forwarded to Defendant.

At this point, the parties are not in a position to settle, pending further discovery and analysis of the claims. The parties do believe the cases will be eventually amenable to mediation, and have agreed to mediate before Mary Burdin at Burdin Mediations, 4514 Cole Avenue, Suite 1450, Dallas, Texas 75205, phone: (214) 528-1411.

## II.

The parties propose the following schedule for the case:

Trial: March 29, 2010

The parties anticipate trial will last two to three days.

A jury has been demanded.

Deadline to Amend Pleadings: August 21, 2009

Deadline to Join Parties: May 29, 2009

Deadline for Filing of Dispositive Motions: January 8, 2010

Deadline for the Filing of Other Motions,  
Including *Daubert* Motions: February 12, 2010

Deadline for Completion of Discovery: January 8, 2010  
(Discovery to be conducted in accordance with the FEDERAL RULES OF  
CIVIL PROCEDURE and Local Rules.)

Deadline for Designation of Plaintiff's Experts  
and Compliance with Rule 26(a)(2): October 9, 2009

Deadline for Designation of Defendant's Experts  
and Compliance with Rule 26(a)(2): November 9, 2009

Date to Commence Settlement Negotiations: September 2009

Deadline for Mediation before Mary Burdin  
of Burdin Mediations: February 19, 2010

## III.

### **CONSENT TO TRIAL BEFORE MAGISTRATE JUDGE**

Plaintiff does consent to trial before Magistrate Judge.

Defendant does not consent to trial before United States Magistrate Judge.

Respectfully submitted,

/s/ Wade A. Forsman

**Wade A. Forsman**

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**ATTORNEY FOR PLAINTIFF**

**LAURA ("JANIE") LAMM**

**MARTIN, DISIERE, JEFFERSON &  
WISDOM, L.L.P.**

By: /s/ Stephen D. Henninger

**WILLIAM W. KRUEGER, III**

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**ATTORNEY FOR DEFENDANT**

**HUNT COUNTY, TEXAS**

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that true and correct copies of the parties' Joint Proposal for Contents of Scheduling and Discovery Order has been duly forwarded to all parties in interest and/or their counsel of record pursuant to Rule 21 and 21a of the TEXAS CIVIL RULES OF PROCEDURE, on the 30<sup>th</sup> day of March, 2009.

/s/ Stephen D. Henninger  
**STEPHEN D. HENNINGER**